

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

KRISTEN ARONOFF	:	
	:	
Plaintiff,	:	CIVIL ACTION
	:	
v.	:	
	:	NO. 2:24-cv-06389-AB
TEMPLE UNIVERSITY, et al.,	:	
	:	
Defendants.	:	

**THE PARTIES PROPOSED DISCOVERY PLAN UNDER RULE 26(f)**

In accordance with Rule 26(f) of the Federal Rules of Civil Procedure, counsel for the parties conferred on January 16, 2025, and submit the following proposed joint discovery plan for the court's consideration:

**I. Rule 26(a) Disclosures**

Counsel anticipate completing the self-executing disclosures on or before February 28, 2025.

**II. Discovery Subjects**

(A) Counsel agree that unless otherwise stipulated by the parties or ordered by the court, discovery must proceed in accordance with the Federal Rules of Civil Procedure. This includes the amendments to the Federal Rules regarding electronic discovery, effective December 1, 2006.

(B) Counsel agree that the subjects for discovery include Plaintiff's background, education history, work history, Plaintiff's medical and mental health history, Plaintiff's claimed damages, Plaintiff's attempts to mitigate damages, the allegations in Plaintiff's complaint, including Plaintiff's claims as to liability and damages, and other matters that might arise in the course of discovery.

(C) Counsel anticipate that the following depositions will be necessary: Plaintiff, her medical and mental health care providers, Plaintiff's supervisors and/or co-workers at her various places of employment, human resources and disability accommodations professions at Plaintiff's various places of employment, experts identified by either party, custodians of records if the parties do not stipulate to authenticity or admissibility of those records, the named individual defendants, and third-party witnesses that may be necessary based on discovery.

### **III. Pretrial Timetable**

The parties request that the close of discovery shall be August 15, 2025 for fact and expert discovery. The parties agree to the default scheduling order, except that they jointly request that dispositive motions shall be due no later than 4 weeks after the close of discovery.

### **IV. Alternative Dispute Resolution**

The parties agree to request jointly a settlement conference before a magistrate judge when all parties agree on an appropriate time to have such a conference, but in no event shall that be later than the full briefing of dispositive motions. If the parties cannot agree on an appropriate earlier time to participate in such a settlement conference, any party may unilaterally request such an earlier settlement conference by letter/motion filed with the court in accordance with paragraph I of Judge Brody's Policies and Procedures.

### **V. Other Pretrial Issues**

The parties expect to enter a joint confidentiality stipulation that will seek to protect, to the extent practicable and consistent with due process and federal law, the privacy rights of Plaintiff and all other persons in their medical and mental health records as well as the education records of people who are not parties to this action. Such protection may include redaction of personally identifiable information or, with leave of court, filing confidential documents under seal in pretrial motions or filings.

/s/ David A. Berlin

Matthew B. Weisberg, Esquire  
David A. Berlin, Esquire  
WEISBERG LAW, PC  
7 South Morton Avenue  
Morton, PA 19070  
[mweisberg@weisberglawoffices.com](mailto:mweisberg@weisberglawoffices.com)  
[dberlin@weisberglawoffices.com](mailto:dberlin@weisberglawoffices.com)  
610-690-0801

Gary Schafkopf, Esquire  
SCHAFKOPF LAW LLC  
11 Bala Avenue  
Bala Cynwyd, PA 19004  
[gary@schaflaw.com](mailto:gary@schaflaw.com)  
610-664-5200 Ext 104

Attorneys for Plaintiff  
Kristen Aronoff

/s/ Neil J. Hamburg

Neil J. Hamburg, Esquire  
Kay E. Sickles, Esquire  
ID Nos. 32175, 75159  
HAMBURG LAW GROUP, PLLC  
1 Franklin Town Blvd, Suite 1106  
Philadelphia, PA 19103  
[hamburgnj@hamburglawgroup.com](mailto:hamburgnj@hamburglawgroup.com)  
[sickleske@hamburglawgroup.com](mailto:sickleske@hamburglawgroup.com)  
(215) 858-2225  
(484) 343-2741

Attorneys for Defendants  
Temple University, Dr. Carrie Snyder,  
Jeanette Rizzo and Dr. Rachael Stark